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LETTER OF TRANSMITTAL

TO: Stainless Steel Products, Inc.
2980 North San Fernando Blvd.
Burbank, California 91504

DATE 17 JANUARY 1989	JOB NO. 88-02
RE:	

ATTENTION: Art Moore

WE ARE SENDING YOU:

- ☒ Attached ☐ Under separate cover via _____ the following items:
- ☐ Shop drawings ☐ Report ☐ Engineering data ☐ Plans ☐ Specifications
- ☐ Proposal ☐ _____ % Submittal ☐ _____

ITEM NO.	NO. OF COPIES	DESCRIPTION
1	1	Attachment A, dated January 12, 1989
2	1	Cost Estimate, dated January 12, 1989
3	1	Project Health and Safety Plan

THESE ARE TRANSMITTED AS CHECKED BELOW:

- ☐ For your approval ☐ For your file ☐ For your information
- ☒ For your use ☐ For your action ☐ As requested
- ☐ For review and comment ☐ _____

REMARKS:

COPY TO: Glenn Gilbert, Zimmerman Holdings, Inc.
Michelle Gutman, Babst, Calland, Clements & Zorn BY: Robert F. Burke/cl

ATTACHMENT A
STAINLESS STEEL PRODUCTS INC.
January 12, 1989

Fig. 1 not provided in report.
Test required?
Provide QA/QC
+ limit of detection

Oil Tank (N.E. corner of SSP property)

locations of the three test borings completed in this area are shown figure 1. The test boring centered over the previous location of the tank will be drilled to a depth of 40 feet. The two test borings on either side of the previous tank location will be drilled to a depth of 20 feet. *5, 10, 15, 20*

The regional groundwater gradient in the area is in a southeasterly direction (Brodine and Son) and based on this information, one of the two lateral borings will be drilled up-gradient from the tank excavation site, and one down-gradient. Samples will be taken at 5, 10, 15 and 20 feet. All of these samples will be analyzed *for what?*

EPA holding time must be observed.
Clarify re this boring

Industrial Waste Clarifier (Building 100)

Two test borings, one at each end of the Industrial Waste Clarifier in Building 100, will be drilled to a depth of 10 feet, starting at a level above the base (Figure 1). Samples will be taken at the surface, 5 and 10 feet. Initially, only two samples from each boring will undergo lab analysis. Depending upon the results from the initial phase of analysis, the remaining sample from each boring location may also be analyzed. *Not held - EPA holding time must be observed. All samples be analyzed.*

3. Vapor Degreaser (Building 100)

One test boring will be completed to a depth of 10 feet below the base of the vapor degreaser containment sump (Figure 1). *Sample analysis*

4. Land Farm Areas & Former Location of PCE Tank

Rather than using a soil gas survey which may prove to be inconclusive, we will drill three test borings over each of the two land farm areas to test for subsurface contamination. Each of the borings will be drilled to a maximum depth of 10 feet, with samples taken at the 2, 5 and 10 foot levels. Initially, only two samples from each boring location will be analyzed. The third sample will be archived for future analysis *NO* pending the results of the initial phase of analysis. The 10-foot sample from each boring will always be one of the samples analyzed in the initial phase of analysis.

minimum 20 ft.

plot plan

A 20 foot test boring will also be drilled at the previous location of the above-ground PCE tank to check for any associated contamination. Samples will be taken at 5, 10, 15 and 20 feet. All of these samples will undergo lab analysis.

PART I: Overview and descriptions

1.0 INTRODUCTION

A. L. Burke Engineers, Inc. (ALB) will be conducting an additional subsurface investigation study of Stainless Steel Products, Inc. (SSP). This study will involve the use of personnel and machinery to obtain drilling core samples from chosen sites. The suspected exposure toxicant for all sites is petroleum hydrocarbons. It is the purpose of this Occupational Health & Safety Plan to define the potential exposures and exacerbating conditions, and to describe in detail, those activities and procedures required to protect workers from hazardous exposures.

The drilling and obtaining of soil and water samples will be conducted by the field crew. A member of the crew may, in some cases, perform more than one job assignment. Job classifications and their assigned tasks are listed below:

The Driller will operate the drill rig for subsurface testing exploration, and will be responsible for drilling the soil borings and backfilling the holes. There will be one individual functioning in this capacity.

The Driller's Helper will assist the driller in adding and removing 5-foot sections of auger to the drill stem. The driller's helper is also responsible for steam cleaning the augers for decontamination between each boring. There may be one or more persons functioning in this capacity, depending on need.

The Field Geologist/Safety Officer will oversee the sampling of borings. This person will also examine the drill cuttings from each boring and will compile a log of the subsurface conditions. This work will occur near the drill rig in the restricted area. The geologist will supervise taking and preparing samples, cleaning and reloading the sampler with brass rings, labeling, and packaging samples for transport. As safety officer, this person will be responsible for monitoring the implementation of Occupational Health & Safety Program and for air monitoring.

The Field Technician will assist the geologist as needed on the tasks for which the geologist is responsible.

2.0 SCOPE AND PURPOSE OF HEALTH AND SAFETY PROGRAM

2.1 Protect Worker Health and Safety. It is anticipated that the drill rig will generate a slight amount of dust from its operation and sample extraction. There is also the possibility of contact with gasoline-contaminated soils in handling the drill bit, augers, cuttings and when preparing the samples for transport.

2.2 Comply With Applicable Federal Occupational Health & Safety Regulations. ALB will comply with all regulations specified under OSHA. Specifically, the following General Industrial Safety Orders (GISO) are incorporated into our program.

2.2.1 GISO 3203 Accident And Illness Prevention Program

2.2.1.1 Administrative supervision of the health and safety program. Mr. Joseph Aldern is responsible for the day-to-day implementation of this program. The Industrial Hygienist will be responsible for auditing compliance with the requirements and intent of the program.

2.2.1.2 Task and job safety analyses. These are included as described above.

2.2.1.3 Training of workers in specific and general work practices. Only personnel with previous training and experience will be part of the field crew. The Safety Officer will review procedures with the crew at time of work start-up.

2.2.1.4 Work zones (restricted, controlled access and neutral). These are described in Section 3.0.

2.2.1.5 Employee decontamination procedures. Containers of water will be available, along with detergent, for washing in the event of contact with hydrocarbons.

2.2.1.6 Specific health and safety hazard awareness. As part of the general project and specific task assignments, specific hazards--including toxic exposures, noise, and heat stress--associated with the job and work site will be reviewed with the field crew by the Safety Officer prior to start up on each new site.

2.2.1.7 Emergency procedures for fire are as follows: alert personnel in the immediate vicinity of a fire; confine the fire by removing items which could be fuel to the fire, provided this can be done without risk of being burned or overcome by smoke; evacuate the area; and summon aid by calling 911. In case of first aid emergencies: Minor injuries requiring first aid should be treated by the site personnel. Emergency victims will be removed from the immediate disaster area, stabilized, and transported by ALB personnel or by summoning the paramedic team by calling 911.

2.2.1.8 Response to extreme weather conditions, such as wind, lightning, floods, etc. Severe winds, flooding, or electrical storms will dictate that all site activity be halted.

2.2.1.9 Personal protective clothing and devices, to include respiratory protection, whole body clothing, foot, hand, head and eye protection. Employees will be responsible for wearing appropriate clothing, as dictated by this health/safety plan and explained by the field supervisor.

2.2.1.10 Eating, drinking or smoking is prohibited in the restricted zone.

2.2.1.11 Medical surveillance, including post job and emergency medical care (emergency treatment facilities). MD Medical Clinic in Anaheim, CA conducts pre-job (baseline) physicals for ALB personnel. Employees have initially been examined to establish blood chemistry profiles and to determine liver and kidney function.

To summon an ambulance or medical assistance, call 911 and describe the emergency. For minor injuries where an employee will transfer the injured party to the hospital, follow the instructions and map on attachment 1.

2.2.1.12 "Buddy system". This system is designed to establish working partners who will observe physiological and behavioral changes in each other possibly caused by exposure to contaminants.

2.2.1.13 Environmental surveillance. To the extent that specific chemicals have been identified as being used at the sites, continuous area air monitoring will be conducted to quantify exposures.

2.2.2 GISO 5194 Material Safety Data Sheets. All employees will be notified of all hazardous substances present in the workplace. Potential toxic effects of gasoline will be explained to the field personnel by ALB.

2.2.3 GISO 3204 Access To Medical And Exposure Records. Each ALB employee assigned to the field will be provided with a copy of his or her own medical records and records of exposures to toxic substances or harmful physical agents.

2.2.4 GISO 3220 Emergency Action Plan: The procedures for reporting emergencies, response procedures and related information are listed in Part III.

2.2.4 GISO 5144 Respiratory Protection Program. Part II will cover the following subjects:

- selection and use of air purifying respirators;
- medical clearance for personnel required to wear negative pressure air purifying respirators;
- instruction and training in use of respirator;
- cleaning, sanitizing, repair and storage of respirators;
- respirator fit testing; and
- quantification of potential exposures.

If, at any time during field operations, vapor monitor readings exceed 50 ppm above background in the breathing zone, the operations shall be shut down until the Safety Officer determines the appropriate course of action (donning respiratory protection, etc.). If respiratory protection procedures are in place, and OVM readings are below 50 ppm above background, the Safety Officer may permit personnel to remove respiratory protection equipment.

PROJECT HEALTH AND SAFETY PLAN

3.0 WORK AREA DESCRIPTIONS

3.1 Restricted Area- That area immediately around the drill rig within a 10 to 25 foot radius, depending on site conditions. Employees in this area will wear cloth clothing consisting of garments with long legs, closed-toed shoes, and hard hat. If indicated by the field supervisor or site safety officer, based on the results of continuous air monitoring, personnel shall don half-mask respirators.

3.2 Controlled Access Area- That area from the perimeter of the restricted area to 25 feet out will be considered the controlled access area. Employees in this area will wear the same clothing as identified above, except that hard hats are not required.

3.3 Neutral Area- That area extending away from the perimeter of the controlled access area: (if the winds and dusts are blowing from the restricted area, the neutral area will be treated the same as controlled access).

PART II: Respiratory protection implementation program

1.0 QUALIFICATION OF INDIVIDUALS TO WEAR A NEGATIVE PRESSURE RESPIRATOR

All personnel required to wear a negative pressure, air purifying respirator will have to display a minimum pulmonary function of 75% of predicted for FEV₁, FVC, FEF₂₅₋₇₅ and FEF₁/FVC Ratio. Each individual will otherwise have to be physically fit to wear such a device, as determined by an examination by a physician.

2.0 RESPIRATOR SELECTION AND FIT TESTING

Each individual assigned to a "restricted" or "controlled access" area will be properly fitted with a half mask face piece air purifying respirator. Air purifying cartridges will meet the NIOSH Approval TC-23C-79/161/243/244/201 or 286.

Fit the facepiece on the nose bridge, making sure that you are able to breathe through the nose. Then swing the bottom of the facepiece into contact with the chin. Position the headbands with longest straps above the ears over the crown of the head, and the shortest straps below the ears, around the nape of the neck; then adjust for comfort by moving adjustment slides to lengthen or shorten straps. Adjust the straps just snug enough so that no air leaks around the facepiece. It is not necessary to pull the straps so tight that the respirator digs into the face.

The respirator must be subjected to the following tightness test before selection and each use. Test respirator for leakage using a positive pressure method. Lightly place the palm of one hand over the exhalation valve cover. Gently exhale. A slight pressure should build up inside the respirator. If any leakage is detected around the facial seal, readjust the head harness straps and repeat the test until there is no leakage. If other than facial leakage is detected, the condition must be investigated and corrected before another test is made.

A negative pressure test will be performed. Lightly place palms over cartridge or filter holders. Gently inhale and the facepiece should collapse against the face. The respirator must pass the tightness tests before the respirator is used. The respirator will not furnish protection unless all inhaled air is drawn through a suitable cartridge or filter, as described above.

The respirator must pass a qualitative fit test for final selection prior to use. This will be done by generating an irritant smoke (for filter cartridges) or amyl acetate banana odor (for organic cartridges). Generate the smoke or odor under the chin and around the bridge of the nose (keeping the eyes tightly closed). During this test, the individual should undergo various facial expressions, including grimacing and smiling. If the wearer passes this type of qualitative fit test, the respirator can be worn in atmospheres up to 10 times the respective threshold limit values (TLV).

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3.0 PREPARATION FOR RESPIRATOR USE

3.1 There are five inspection points, listed below, that should be checked before donning the respirator. Under no circumstances should a respirator that fails inspection be used. The respirator should be repaired or replaced.

3.1.1 Headbands: Check to see that the headbands still have their elasticity. Inspect for breaks or tears in the material and make sure all clips, fasteners, and adjusters are in place and working properly.

3.1.2 Facepiece: Check facepiece for dirt, cracks, tears, or holes. Inspect the shape of the facepiece for possible distortion that may occur from improper storage. Make sure that rubber is flexible, not stiff. Check the aluminum yoke for cracks.

3.1.3 Inhalation and exhalation valves: Check for cracks, tears, distortion, dirt, or build-up of material between valve and valve seat.

3.1.4 Cartridge holders: Check to make sure gaskets are in place and check for cracks and damage to threads.

3.1.5 Cartridge and/or filters: Make sure cartridges and filters are clean. Never try to clean a filter or cartridge by washing it or using compressed air. Inspect the cartridge, particularly the metal sealing band around the bottom, for dents, scratches, or other damage.

3.2 Thread cartridges into receptacles carefully. Hand tighten to prevent damage to threads and to insure a good seal against the gaskets. Insert appropriate filters into the appropriate filter cover. Never load a filter into the receptacle. Snap filter covers onto both receptacle or cartridges taking care not to damage filters.

3.3 The following conditions are indications that the cartridge or filters have served their useful life and should be replaced. Cartridges: Odor or taste of gases or vapors; eye, nose, or throat irritation. Filters: Excessive breathing resistance upon inhalation.

4.0 RESPIRATOR MAINTENANCE AND CLEANING

The facepiece (with cartridge removed) should be cleaned and sanitized after every use. A light dish soap solution followed by a blotting action and air drying will suffice. Never exceed 120° F temperature in order to avoid facepiece distortion.

The respirator must be kept in good condition to function properly. When any part shows evidence of excessive wear or failure, it should be replaced

PROJECT HEALTH AND SAFETY PLAN

immediately with the proper part. Extra parts will be readily available. Do not use parts from a different brand or type of respirator.

After cleaning and maintenance, each respirator should be stored in an air tight bag, such as a plastic refrigerator bag with twist-a-seal.

5.0 CONTRAINDICATIONS FOR CHEMICAL CARTRIDGE USE

The following is a partial list of gaseous materials for which chemical cartridge respirators should not be used for respiratory protection regardless of concentrations or time of exposure; this far-from-complete list is offered only as a guide to proper evaluation of the many contaminants found in industrial operations.

Acrolein	Aniline	Arsine	Bromine
Carbon monoxide	Dimethylaniline	Dimethyl sulfate	Hydrogen cyanide
Hydrogen fluoride	Hydrogen selenide	Hydrogen sulfide	Methanol
Methyl bromide	Methylene chloride	Nickel carbonyl	Nitro compounds:
Ozone	Phosgene	Phosphine	Nitrobenzene
Phosphorous	Stibine	Sulfur chloride	Nitrogen oxides
trichloride	Toluene diisocyanate	Vinyl chloride	Nitroglycerin
			Nitromethane

None of these compounds has been used on the sites in the past, nor are any of these expected to be encountered during this work.

The safety officer will be responsible for assuring that all individuals comply with the requirements of the program. The safety officer will randomly check each individual's respirator to assure compliance with the proper care and maintenance of the respirator and cartridge.

Employees found violating the terms of this implementation program will be issued a written warning upon first violation, followed by disciplinary action on the second violation, and release from the project upon the third violation.

PART III: Emergency action plan

During this work, the following emergency action procedures will be in effect.

Notification and Summoning Assistance. The following procedures should be used to summon assistance in case of emergency:

Fire: Dial 911 to call the Firefighters in case of fire. A fire extinguisher is available with the drill rig for use in case of small fires. The first consideration will be personnel safety, and crews will be instructed not to attempt to handle emergencies where possible injury would result.

Medical Emergency: Dial 911 to summon the paramedics for situations requiring medical attention (severe bleeding, shock, heat stroke, major injuries, etc.). Administer first aid and institute emergency actions until paramedics arrive.

Medical First Aid: A first aid kit is available with the rig to treat minor injuries.

Non-emergency: Dial (714)666-1120 for A. L. Burke Engineers

Evacuation Procedures: In case of emergency requiring evacuation, notify SSP personnel immediately and follow their evacuation plan. Personnel shall assemble outside the plant gate after the evacuation to be accounted for and receive further instructions. No one shall reenter an evacuated site until the Site Geologist has given clearance to return.

Intra-Site Communications: Because of the small size of the crews and the work areas, oral communications shall be used to minimize the potential for confusion during an emergency.

Documentation: The Site Geologist shall prepare a complete report on any emergency incident including the date, time, nature of the incident, action taken and final outcome. This information shall also be entered in the field log.